

In the present claimed invention, the second data table stores, among other things, an identification of a category to which an entity belongs. The third data table stores descriptive information about the category. The same can be done for a subcategory in a fourth data table, as recited in dependent claims 45 and 49.

Illustrative examples of the descriptive information and the ID/description tables are given in the originally filed specification on page 38, lines 7-21. The ID/description tables provide detailed descriptions of items that may be identified elsewhere only by name, e.g., of a category. The detailed descriptions can be free-form text descriptions.

The present invention, with the use of such data tables storing descriptive information about a category, offers the following advantage. A user who sees a name of a category or a subcategory may not find the name by itself very helpful in ascertaining what the category or subcategory entails. That user can then request a detailed description of the category or subcategory. In that case, the database server can go to the third data table (or fourth, in embodiments that use one) to retrieve the detailed description and present it to the user.

By way of comparison, *Riordan et al* teaches a data structure for collecting and analyzing point-of-sale information. Items are identified by code numbers in a hierarchical classification system; for example, sneakers are classified as clothing, then footwear, then athletic footwear, etc. The Examiner states that the reference teaches storing descriptive information about a category.

The Examiner acknowledges that *Riordan et al* is silent on a separate third data table for storing the descriptive information about the category. Instead, he cites *Kouichi et al* for that teaching and argues that it would have been obvious to combine the two references to achieve the present claimed invention. However, in the Amendment filed August 23, 2002, the present

claimed invention was distinguished over *Kouichi et al* on just that point. The Examiner apparently agreed, or he would not have had to apply additional prior art. Therefore, if *Riordan et al* does not teach all features of the present claimed invention, the combination of *Riordan et al* with *Kouichi et al* cannot do so either.

As a separate and independent argument against the Examiner's rejection, the Applicant respectfully disagrees with the Examiner's reason why it would have been obvious to combine the two references. The Examiner has the burden of showing that a person having ordinary skill in the art would have been taught or motivated to combine the references. As a matter of law, the Examiner may not meet that burden simply by showing that the references could have been combined as he suggests or that the combination is "obvious" in hindsight.

The Examiner argues that the combination would have been obvious "for the discretion of a user." However, it is not clear why a person having ordinary skill in the art who had reviewed the two references would have recognized it as within that user's discretion to provide a separate data table for the descriptive information about a category, when the applied references do not even teach such a thing. Therefore, the Applicant respectfully submits that the Examiner has not met the burden of proof.

Fohn et al teaches a database for an electronic catalog. The Examiner cites that reference for teaching of a free-form text field in a database. However, the portion of the reference that the Examiner cites for that proposition concerns a text description of a specific product, not of a category. Therefore, the Applicant respectfully submits that the Examiner's position on that reference is unfounded as well.

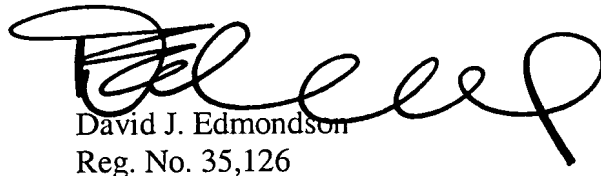
As a result, the Applicant respectfully submits that neither of the combinations of references applied in the Office Action would have provided a person having ordinary skill in the art with any teaching, suggestion, or motivation to achieve the present claimed invention.

For the reasons set forth above, the Applicant respectfully submits that all outstanding grounds of rejection have been addressed and overcome and that the application is in condition for allowance. Notice of such allowance is earnestly solicited.

If any issues remain that can be overcome through a telephone communication, the Examiner is invited to telephone the undersigned at the telephone number set forth below.

The Office is authorized to charge any deficiency in fees, or to credit any overpayment thereof, to BLANK ROME LLP, Deposit Account No. 23-2185 (110273.00102). If a petition for an extension of time is required to render this submission timely and is not filed concurrently herewith or is insufficient to render this submission timely, the Applicant hereby petitions under 37 C.F.R. §1.136(a) for such an extension for as many months as are necessary to render this submission timely. Any fee due is authorized above.

Respectfully submitted,



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